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August 6, 2001

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on 2-Propanol, 1,3-dichlorophosphate

Dear Administrator Whitman:

The following comments on the test plan for 2-propanol, 1,3-dichlorophosphate are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than nine million Americans.

The Akzo Nobel Functional Chemicals LLC has presented robust summaries that adequately address each ecotoxicity and human health endpoint of the SIDS battery required under the High Production Volume voluntary program and therefore appropriately has not called for more tests under this program. 2-Propanol, 1,3-dichlorophosphate has been tested on many animals, and any further testing on animals would not contribute to the understanding of its toxicity.

Sincerely,

Nicole Cardetto, M.H.S.
Staff Scientist